

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Mei L. Wang, Michael Y. J. Wang, Chun Fang Wang,

Plaintiffs,

v.

CYR International, Inc., Chew Young Roo America, Inc.,
CYR USA, Inc., Chew Young Roo, Inc., Chew Young Roo,
Chew Young Roo, Eun Chan Lim,

Defendants.

Civil Action No.:

07 CV 05462 (BSJ)

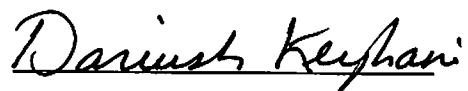
**DECLARATION OF
DARIUSH KEYHANI, ESQ.**

DARIUSH KEYHANI hereby declares pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a member of the Bar of this Court and the law firm of Meredith & Keyhani, PLLC, attorneys for the plaintiffs Mei L. Wang and Michael Y. J. Wang, Chun Fang Wang ("Plaintiffs").
2. I am familiar with all the facts and circumstances in this action.
3. I make this Declaration pursuant to Rule 55.1 of the Civil Rules for the Southern District of New York and Rule 55(a) of the Federal Rules of Civil Procedure for the Southern District of New York and Rule 55(a) of the Federal Rules of Civil Procedure, in support of Plaintiffs' application for an Order to Show Cause for entry of default Judgment and preliminary relief against defendants Chew Young Roo (Fort Lee, New Jersey), Chew Young Roo (Closter, New Jersey) and Chew Young Roo, Inc. (Upper Darby, Pennsylvania)(hereinafter collectively "Default Defendants").

4. This is an action to recover damages owed by the Default Defendants and for a permanent injunction for trademark infringement and related claims under the Lanham Act and New York State law.
5. Jurisdiction over the subject matter of this action is based on Federal Question jurisdiction, including 15 U.S.C. §1051 et seq.
6. Upon information, and belief Default Defendants are not infants, in the military or an incompetent person.
7. This action was commenced on June 8, 2007 by the filing of the Summons and Complaint.
8. Defendant Chew Young Roo, Inc. was served with a copy of the Summons and Amended Complaint on July 10, 2007 and proof of service was filed with the Court on August 31, 2007. Defendant Chew Young Roo (Fort Lee, New Jersey) was served with the Summons and Amended Complaint on August 25, 2007 and proof of service was filed with the Court on October 4, 2007. Chew Young Roo (Closter, New Jersey) was served with the Summons and Amended Complaint on July 6, 2007 and proof of service was filed with the Court on October 4, 2007.
9. As reflected in the Clerk's Certificate submitted herewith, the docket entries indicate that the Default Defendants Chew Young Roo (Fort Lee, New Jersey), Chew Young Roo (Closter, New Jersey), and Chew Young Roo, Inc. (Upper Darby, Pennsylvania) have not filed an answer or otherwise moved with respect to the Amended Complaint herein.

Dated: October 25, 2007


Dariush Keyhani, Esq.